

SDMS US EPA REGION V -1

**SOME IMAGES WITHIN THIS
DOCUMENT MAY BE ILLEGIBLE
DUE TO BAD SOURCE
DOCUMENTS.**

C.2
3/20/85
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153320

EPA Air-163121AAP		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		I. IDENTIFICATION	
II. SITE NAME AND LOCATION		01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER	
Trade Waste Incinerators		#7 Mobile St.			
03 CITY Sauget		04 STATE IL		05 ZIP CODE 62201	
06 COORDINATES LATITUDE 38 36 00.0		LONGITUDE 090 10 04.5		07 COUNTY St Clair	
08 COND 163		09 DIST 23		Cahokia (225c)	
10 DIRECTIONS TO SITE (Starting from nearest public road) See Attached Map					
III. RESPONSIBLE PARTIES					
01 OWNER (if known)		02 STREET (Business, mailing, residential)			
Waste Management, Inc		3003 Butterfield Road			
03 CITY Oak Brook		04 STATE IL		05 ZIP CODE 60521	
06 OPERATOR (if known and different from owner)		07 TELEPHONE NUMBER 312-654-8800			
Trade Waste Incinerators		08 STREET (Business, mailing, residential)			
09 CITY Sauget		10 STATE IL		11 ZIP CODE 62201	
12 TYPE OF OWNER (Check one)		13 TELEPHONE NUMBER 1618-271-2804			
<input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL		<input type="checkbox"/> F. OTHER <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)					
<input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED 11-18-80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (RCRA 102) DATE RECEIVED 1-1-81 <input type="checkbox"/> C. NONE					
IV. CHARACTERIZATION OF POTENTIAL HAZARD					
01 ON SITE INSPECTION		02 BY (Check all that apply)			
<input checked="" type="checkbox"/> YES DATE 7-14-81		<input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR			
<input type="checkbox"/> NO DATE 10-22-84		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER			
CONTRACTOR NAME(S):					
03 SITE STATUS (Check one)		04 YEARS OF OPERATION			
<input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		~1979 Present <input type="checkbox"/> UNKNOWN			
05 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN OR ALLEGED					
(Sludge, Oily Waste, Solvents, Pesticides, Other Organics, Other Inorganics, Acids, Bases, Heavy Metals, Toxic, Corrosive, Persistent Soluble, Infectious, Flammable, Ignitable, Volatile, Reactive)					
06 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION					
Ground Water (Environment) Fire/Explosion (Population/Environment) Surface Water (Environment) Direct Contact (Population/Environment) Vapor Release (Population/Environment)					
V. PRIORITY ASSESSMENT					
07 PRIORITY FOR INSPECTION (Check one if high or medium is checked, complete Part 2. Waste information and Part 3. Description of Hazardous Conditions and Incidents)					
<input type="checkbox"/> A. HIGH <input checked="" type="checkbox"/> B. MEDIUM <input type="checkbox"/> C. LOW <input type="checkbox"/> D. NONE					
VI. INFORMATION AVAILABLE FROM					
01 CONTACT		02 OF (Agency/Organization)		03 TELEPHONE NUMBER	
Andrew J. McCoy		T.W.I. General Manager		1618-271-2804	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY		06 ORGANIZATION	
Richard Lange		IEPA		HSCS	
		07 TELEPHONE NUMBER		08 DATE	
		1217-222-6160		3-20-85	

EPA FORM 2070-12 (7-81)

006151



~~H~~ HIGHLY VOLATILE
~~E~~ EXPLOSIVE
~~R~~ REACTIVE
L INCOMPATIBLE
M NOT APPLICABLE

006152



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IL 098642424

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED

NA

02 ☒ OBSERVED (DATE 6-22-82)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

Sample of 6-22-82 confirms volatile organics
contamination of Ground Water, see Attached lab results,
Sample taken at Clayton Chemical Site

01 ☐ B SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 ☒ C CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED

>100,000

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ☒ ALLEGED

Emissions from incinerator and vapor release from
storage and handling, no releases could be immediately
verified but are highly suspect

01 ☒ D FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED

>10,000

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

☒ POTENTIAL ☐ ALLEGED

Tank & drum storage of flammable & Ignitable
material

01 ☐ E DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 ☒ F CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED

>33

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ☒ ALLEGED

Soil contamination in area of old site verified 6-22-82
not directly associated with T.W.I. Both old & new site suspect
because of nature of activities at sites

01 ☐ G DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 ☒ H WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED

unk

02 ☒ OBSERVED (DATE 6-14-82)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

No verification other than letter from Clayton Chem. Co.
to T.W.I. (see Attached letter)

01 ☐ I POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED

02 ☐ OBSERVED (DATE)
04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IL 0 098642424

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (include number of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES 02 ☒ OBSERVED (DATE 5-20-82) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED HP.T 04 NARRATIVE DESCRIPTION

Leaking drums stacked 3 High in violation of permit
allowing maximum 2 high storage

01 ☐ N. DAMAGE TO OFFSITE PROPERTY 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Discharge of precipitator/cooling water to Sanget POTW.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

06 DESCRIPTION OF ANY OTHER KNOWN POTENTIAL OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: >100,000

IV. COMMENTS

See Also Clayton Chemical Co ILD 066918327
Bliss Waste Oil IL New Site

V. SOURCES OF INFORMATION (See Agency References & State Use Sample Analysis Reports)

IEPA Files (Land & Air) TWI Land - 16312109 Air 163121AAP
Clayton " 16312104 " 163121AAJ
Bliss " 16312111

6-20-92

EXECUTIVE SUMMARY

Trade Waste Incinerator (T.W.I.) has operated a hazardous and medical waste incinerator in Sauget, IL since 1979. T.W.I. began operation on property leased from Clayton Chemical and moved to a contiguous location in 1983, following termination of their lease by Clayton Chemical. The relocation involved a move of approximately 600 ft. to a 33 acre site adjoining Clayton Chemical on one corner.

Relocation of the T.W.I. incinerator involved expansion of the facility's storage capacity and improvement of the overall ability of T.W.I. to handle and store waste prior to incineration. A full RCRA closure of the old T.W.I. site was deemed unnecessary, by USEPA, as Clayton Chemical's intention was to continue hazardous materials activity at the site.

Groundwater contamination has been verified at both the Clayton Chemical and new T.W.I. sites along with soil contamination at the Clayton site. Soil contamination at the new T.W.I. location was verified during the permitting process. No substantiation of air releases was readily available to the author but considering the amount of time the incinerator has operated with the precipitator inoperative this allegation would seem accurate.

A medium priority has been assigned to this site. There is no known use of groundwater in the Sauget area as a potable supply and identification of a point source for contamination improbable. While operating at the Clayton Chemical site T.W.I. was also in close association with tanks operated by Jerry Russel Bliss, addressed in a separate preliminary assessment, which are a known contributing factor to soil and groundwater contamination. In the opinion of this author further work at this site should concentrate on maintenance of air quality standards by T.W.I.

RL:mkb:S/139

006155



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: May 28, 1982
TO: Division File
FROM: Diane M. Spencer *DMS*
SUBJECT: St. Clair County - 16312109 - Sauget/TWI

JUN 2 1982

EPA - D.L.P.C.
STATE OF ILLINOIS

On May 20, 1982, J.P. Evans and I conducted an inspection at the subject facility. A joint operating permit was issued on March 13, 1980 (1979-19-0P) revised, between Clayton Chemical and Trade Waste Incineration. At this time, Clayton Chemical recycles waste solvents, while TWI is an incinerator for numerous waste streams.

On February 23, 1982, Supplemental Permit No. 1982-20 was issued to allow modification for the site's development and operation. Specifically, liquid waste storage in tanks and drums was addressed. Special conditions of this supplemental permit required that secondary containment be provided for the drum storage area, with containment to equal 10% of the maximum storage capacity. A certified plan sheet is to be submitted upon completion, showing construction details and the maximum quantity of drums stored. A second special condition requires drum storage to be a maximum height of two drums.

While at the facility, it was observed that one concrete pad, approximately 10 x 10 ft., has been recently poured along the northern edge of the storage area. No curbing or diking has been placed around this pad or other storage areas. The pad is placed on the edge of the site's property.

Drum storage presently is occurring on pallets placed on a gravel base. All drums are stacked three high. Waste was observed leaking from several of the drums. Some fiberpacks were also observed. Drum storage occurs up to the site boundary along the west, adjacent to the railroad tracks. No buffer zone has been left between the storage area itself and the site's boundary, although many of the wastes stored here are flammable.

Paint waste in small, pint-size styrofoam containers was stored in brown paper bags atop a pallet. It was not determined if this waste was shipped to TWI in this manner or if the waste is placed in bags just prior to burning. Two pallets near the brown bags were used for storage of a sludge-like waste in garbage bags. Some of the garbage bags were also placed inside paper bags. A puddle of waste had collected at the edge of the pallets due to a broken bag. This spill was being cleaned up as we departed from the site. A pallet containing 5-gallon buckets was observed approximately three ft. from Bliss' storage tanks.

During the file review for the facility, it was noted that Special Waste Supplemental Permit No. 810634 expired on April 7, 1982. This permit was for the incinerator ash to be disposed at Brighton Landfill in Macoupin County. At this time, no renewal has been received by our office.

cc: Southern Region
Jim Reid - FOS Manager
Sallie Smith - Permit Section

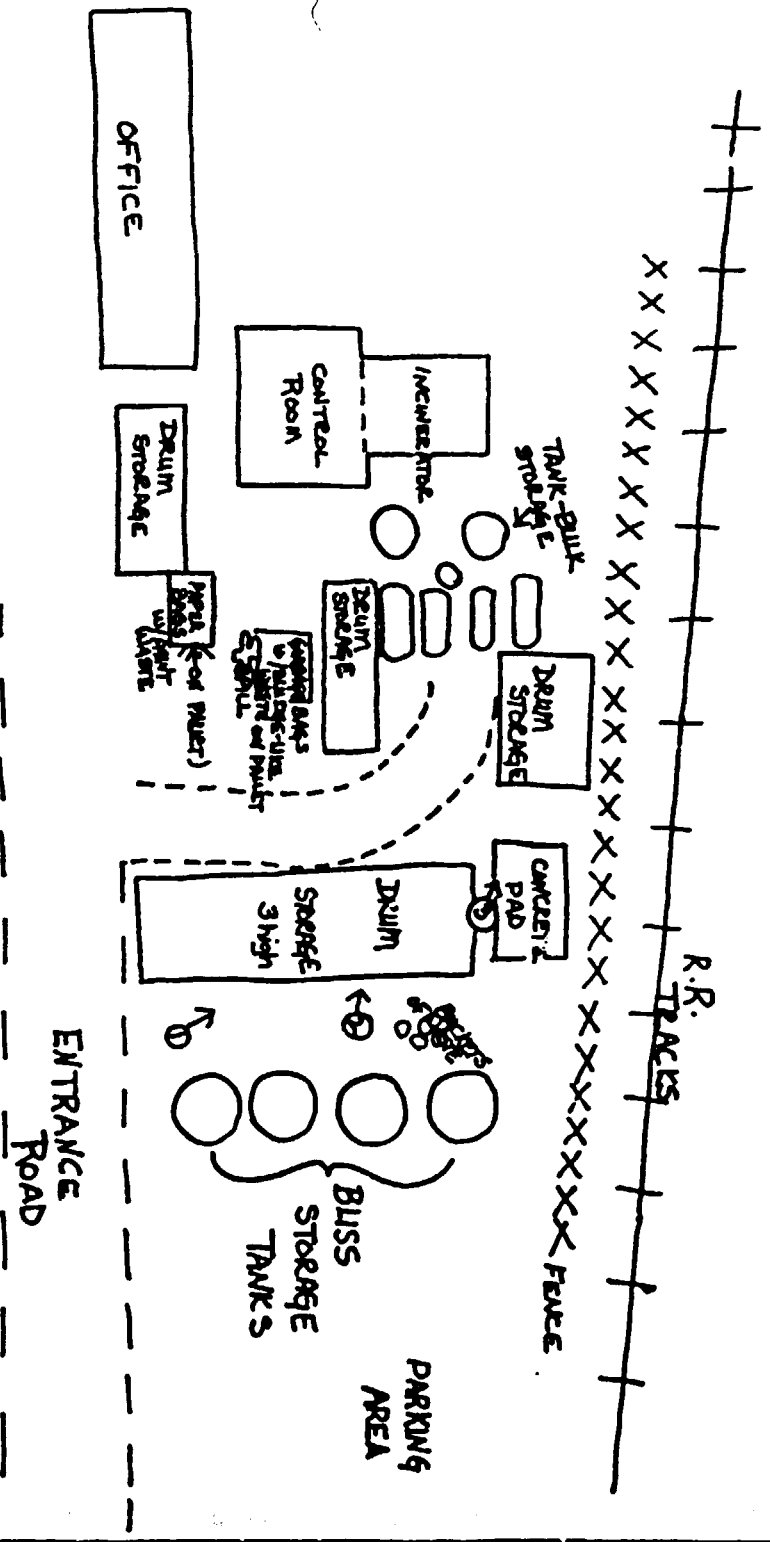
ST. CLAIR Co. LPC 11/3/2109

DATE: May 20, 1982

SARGEET / TRADE WASTE INCINERATION

TIME: 11:15

4 photos



CC: SOUTHERN REGION
SALLIE SMITH

006157

LPC REFERENCE SHEET (SAME FACILITY)

Facility Number: 1631210009 County: St. Clair

Facility Name: Trade Waste Incineration

USEPA Number: I L O C 9 8 6 4 2 4 2 4

File Category: Superfund HRS

FOR ADDITIONAL INFORMATION SEE FILE CATEGORY: FCS

Date

Brief Description of Documents

5-25-83

FOS Inspection

6-22-82

" " "

8-23-82

" "

7-14-91

FOS Inspection

5-31-83

Letter to Robert Kuykendall

066158

LPC REFERENCE SHEET (SAME FACILITY)

Facility Number: 163L210009 County: St. Clair

Facility Name: Trade Waste Incineration

USEPA Number: IL0098642424

File Category: Superfund HRS

FOR ADDITIONAL INFORMATION SEE FILE CATEGORY: Compliance

Date

Brief Description of Documents

3-21-83

Letter to Ken Mensing from Clayton Chem.

6-16-82

Letter to TWI from Clayton Chem.

006159

LPC REFERENCE SHEET (SAME FACILITY)

Facility Number: 1631210009 County: St. Clair

Facility Name: Trade Waste Incineration

USEPA Number: IL0098642424

File Category: Superfund HRS

FOR ADDITIONAL INFORMATION SEE FILE CATEGORY: RCRA Permits

Date

Brief Description of Documents

12-21-83

Letter to USEPA amending Part A

5-2-84

" "

7-12-82

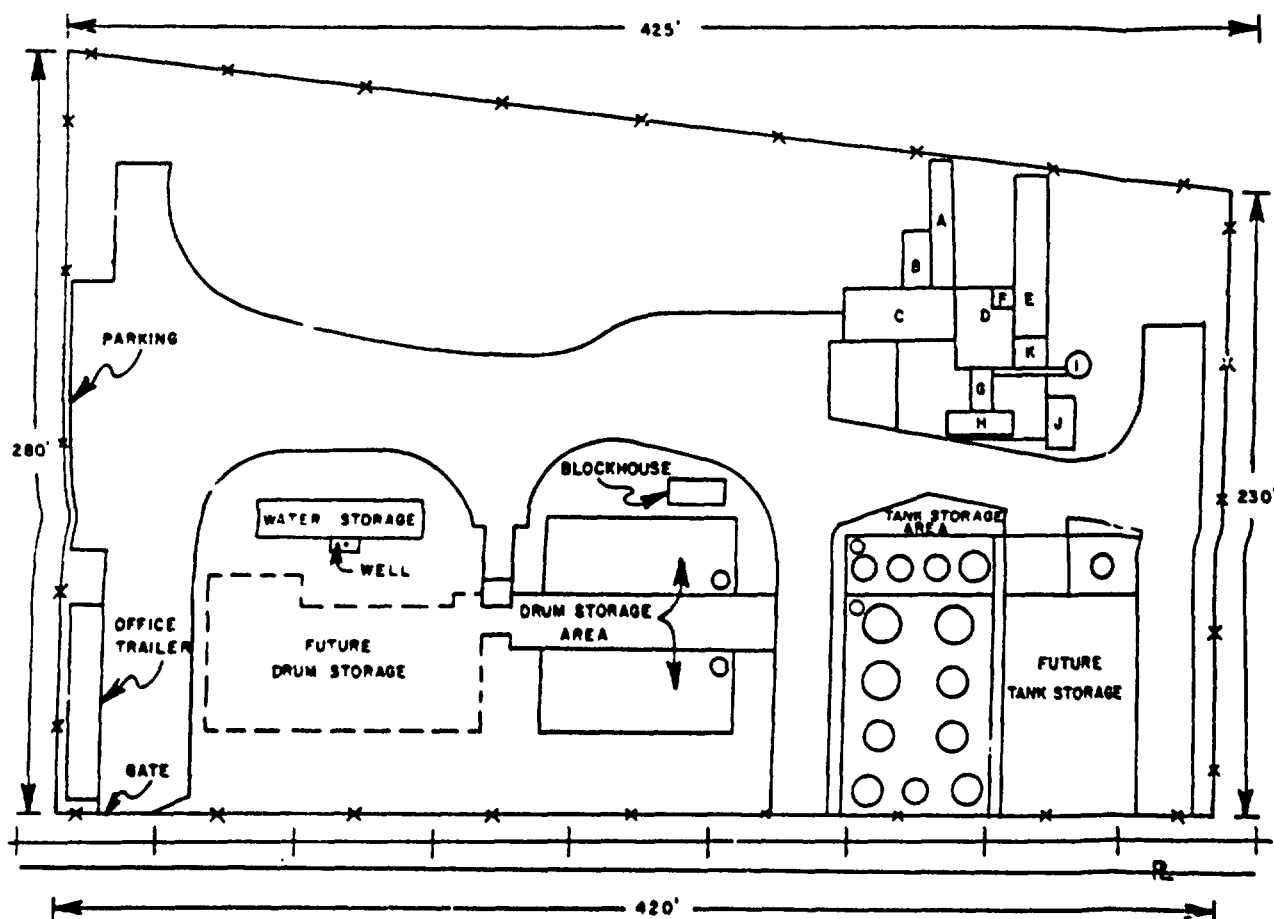
Memo From R.L. Stone

5-31-84

Letter to Andrew McCoy

006160

ACTIVE AREA



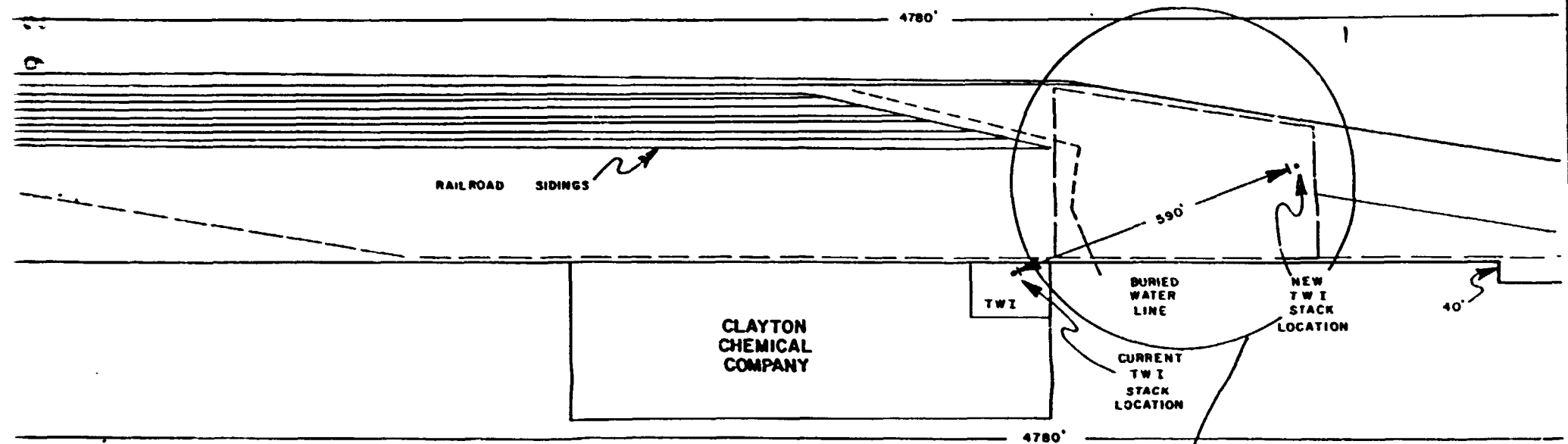
INCINERATION COMPLEX

- A — MAINTENANCE TRAILER
- B — AIR / HYDRAULIC
- C — DOCK
- D — PROCESS BUILDING
- E — PROCESS TRAILER
- F — MOTOR CONTROL CENTER
- G — INCINERATOR
- H — ASH DUMPSTER
- I — STACK
- J — SCRUBBER WATER TANK
- K — INSTRUMENTATION ROOM

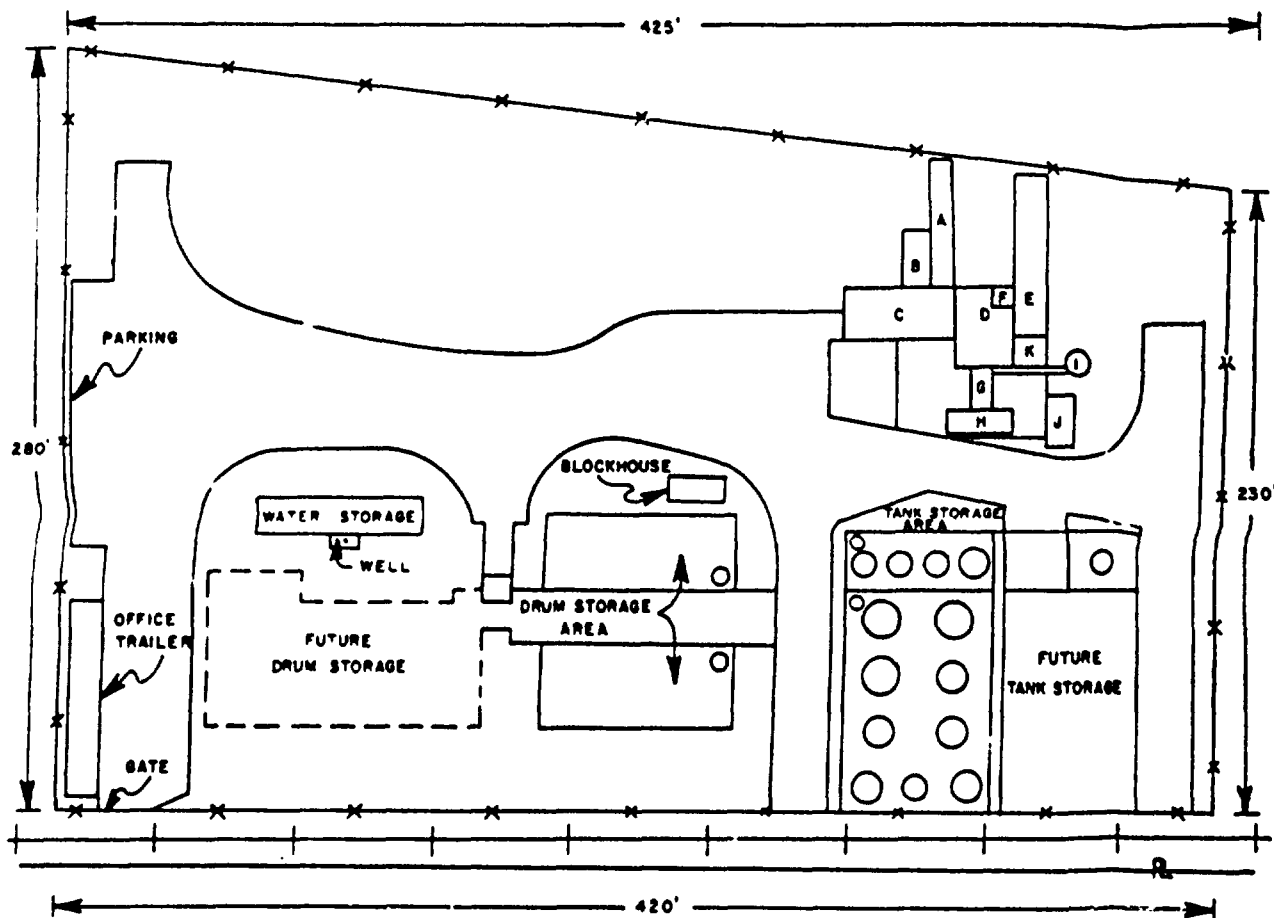
*Submitted
2-9-83
from M. Rapps Assoc.*

006161

93-0107



ACTIVE AREA

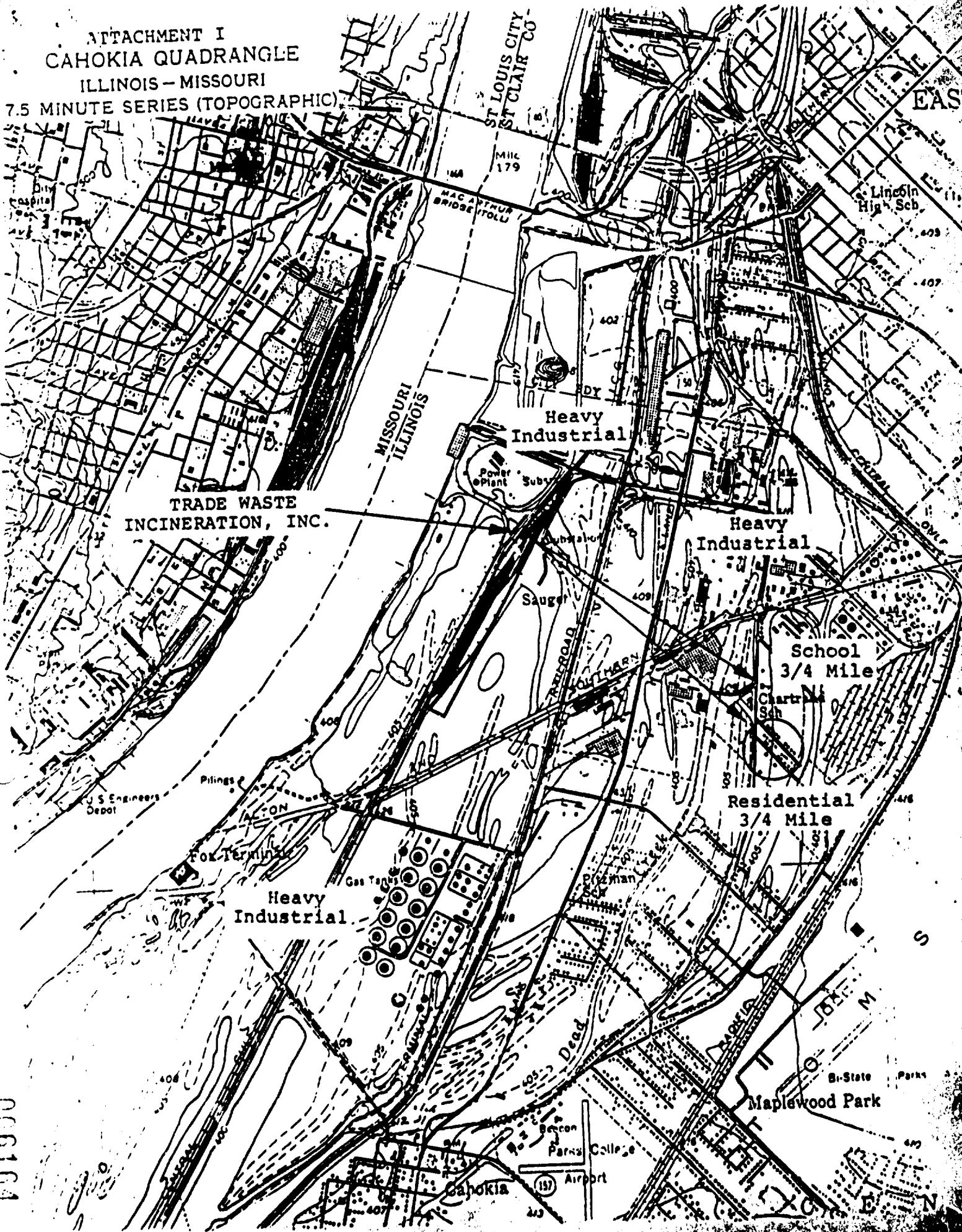


INCINERATION COMPLEX

- A — MAINTENANCE TRAILER
- B — AIR / HYDRAULIC
- C — DOCK
- D — PROCESS BUILDING
- E — PROCESS TRAILER
- F — MOTOR CONTROL CENTER
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- J — SCRUBBER WATER TANK
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*Submitted
2-9-83
from M. Rapps Assoc.*

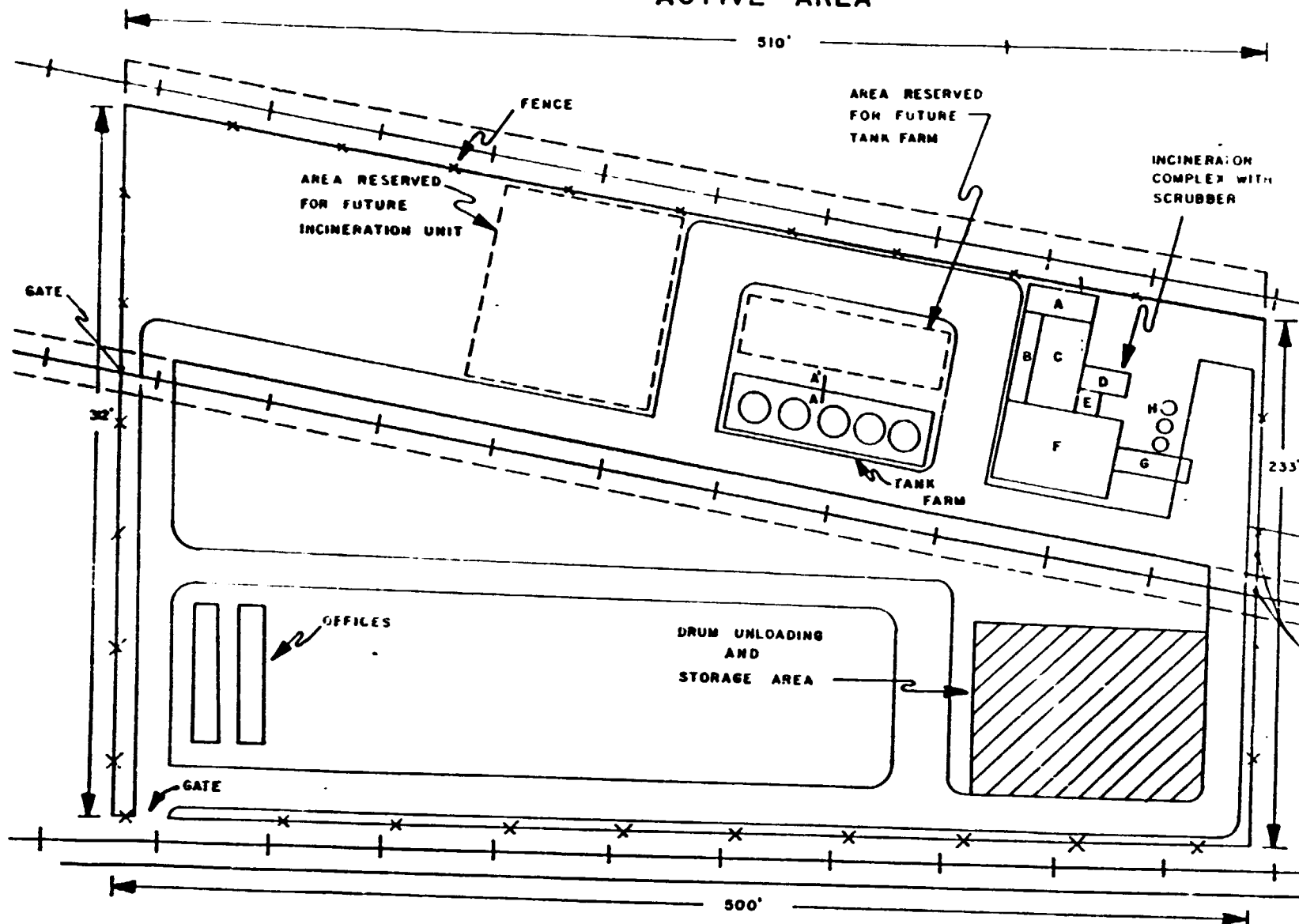
ATTACHMENT I
CAHOKIA QUADRANGLE
ILLINOIS - MISSOURI
7.5 MINUTE SERIES (TOPOGRAPHIC)



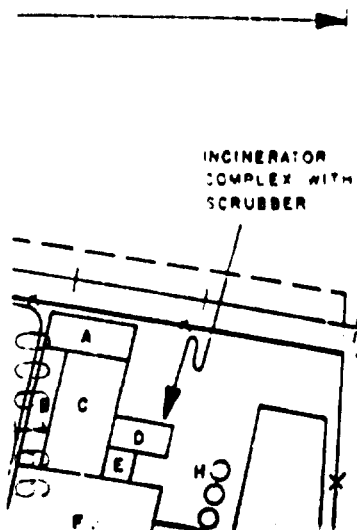
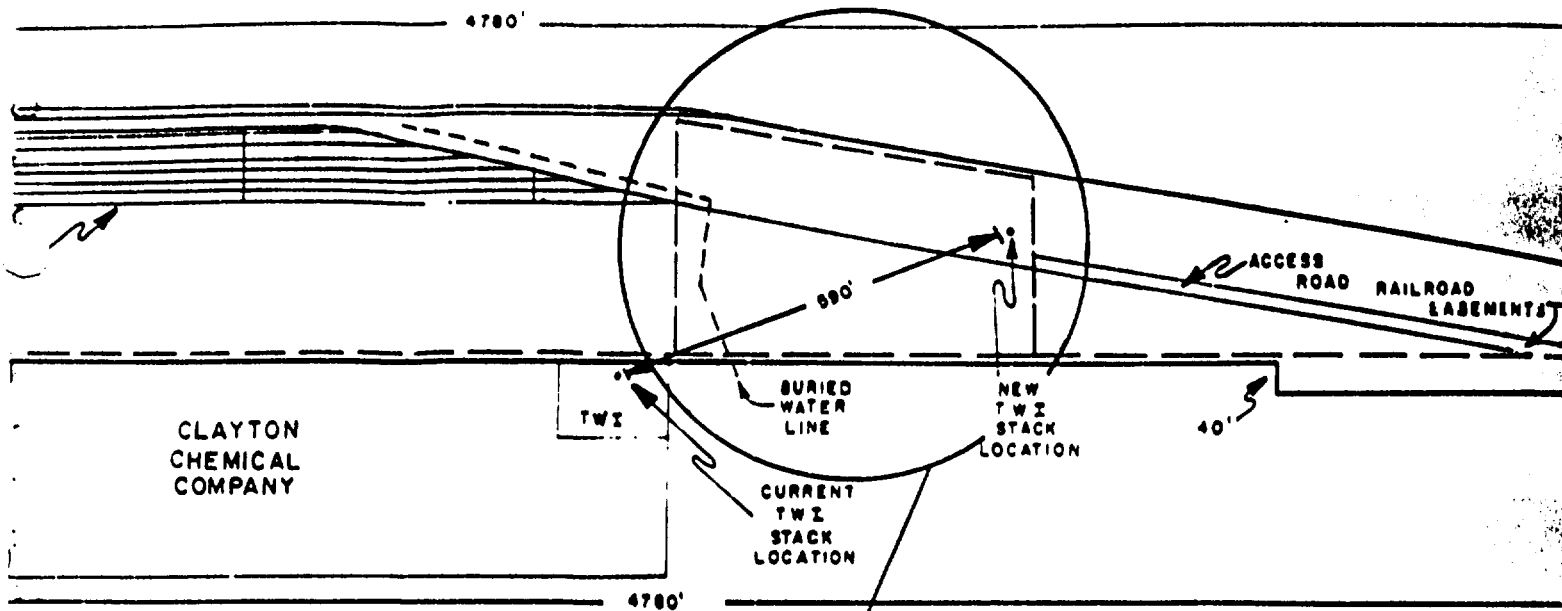
006164

5919

ACTIVE AREA



INCINERATION COMPLEX



Long 2-

Also has three more of the
same pattern & just
back to me

5/12/83

T.W.I. Inc.

Trade Waste Incineration Inc.

No. 7 Mobile Drive • Sauget, Illinois 62201 • 618-271-2804

August 2, 1983

Illinois Environmental Protection Agency
Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

Attn: Mr. Robert Kuykendall, Manager

Re : Trade Waste Incineration
Pre-operation Baseline Sampling,
Soil and Water

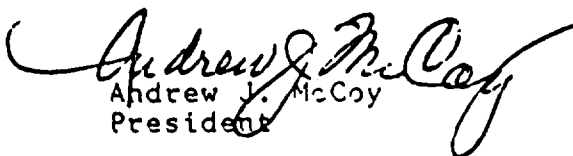
Dear Mr. Kuykendall:

We are submitting test results of
the soil and water sampling that was done by
Envirodyne prior to our operating on this
site.

This information is for your
records and for future reference.

Sincerely,

T.W.I., Inc.


Andrew J. McCoy
President

AJM:dem

Enc.

CONFIDENTIAL

006168



ENVIRODYNE
ENGINEERS

12181 Lockland Road
St. Louis, Missouri 63141
(314) 634-8988

REPORT OF ANALYSIS

⑦

Environment • Energy • Transportation

SUBMITTED BY: Ms. Willeen Sweet
TWI
#7 Mobile Drive
Sauget, Illinois 62201

DATE: 8/1/83
PROJECT NO. 1953-227
P.O.

DATE RECEIVED: 6/21/83 (first sample); 7/19/83 (second sample)

SAMPLE ANALYZED: Water. Samples to be run in triplicate.

METHODS USED: EPA Methods 624, 625, 601 for organics; Methods for Chemical Analysis of Water and Wastes, EPA, 1982 revision.

RESULTS:

FROM TWI WELL

See Summary Sheets

The volatile compounds for sample of 7/19 were not complete at the time of this report.

/rbk

0.1.1

006169

ENVIRODYNE ENGINEERS

BY:

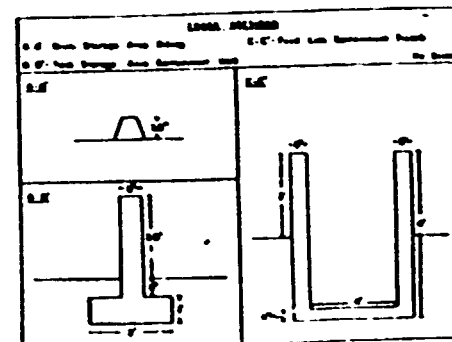
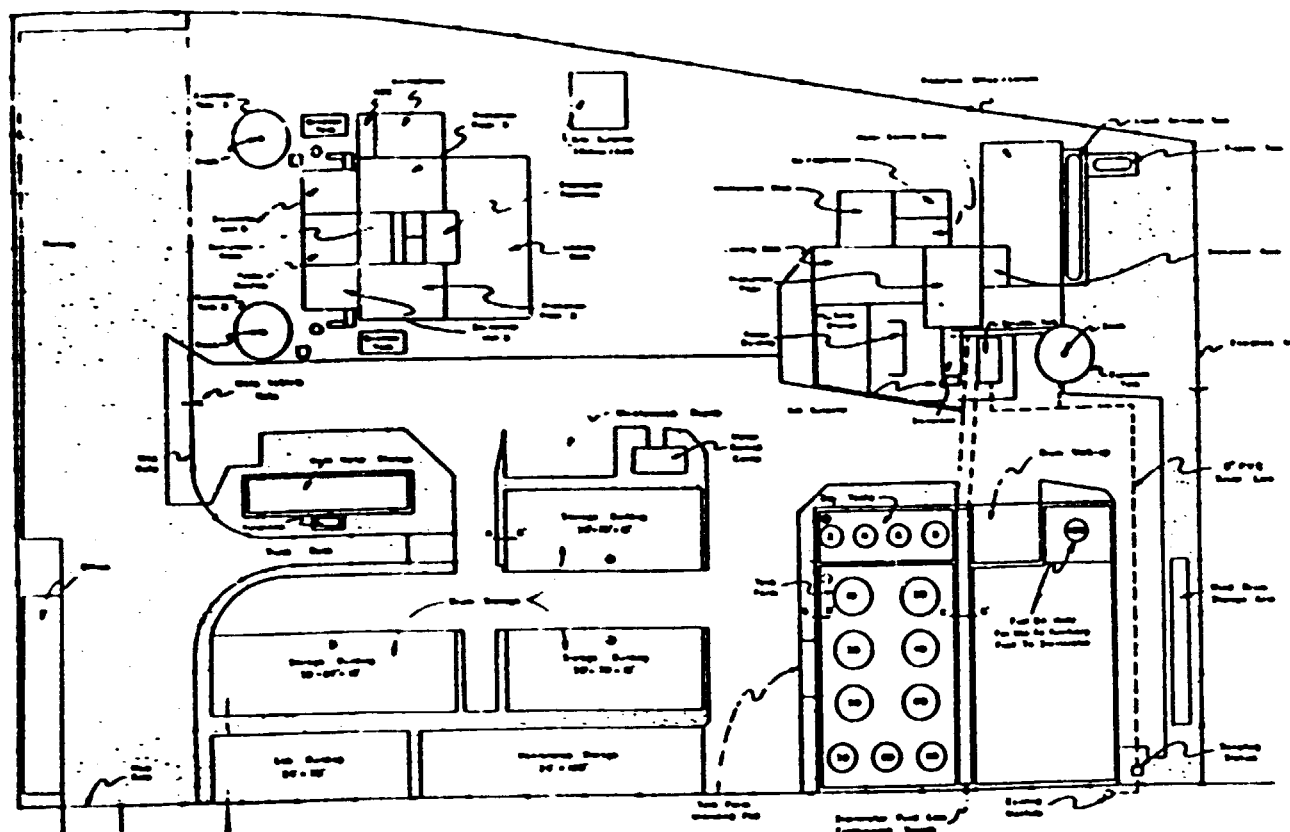
Paul R. Myers

006170

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

JAN 12 1984

RECEIVED

M. Ropps Associates
Environmental Engineering

Trade Waste Incineration, Inc.

Souget, Illinois
Site PlanTRADE WASTE INCINERATION
A DIVISION OF
CHEMICAL WASTE MANAGEMENT, P.INCINERATION PROCESS
MODULE ADrawing Number: T-100
Design Engineer: [Name]
Reviewed By: [Name]Date: 1-1-80
Rev. 2: 1-1-80

ATTACHMENT 1

LEGAL PROPERTY DESCRIPTION,
TOPOGRAPHICAL MAP AND SURVEY

11006171

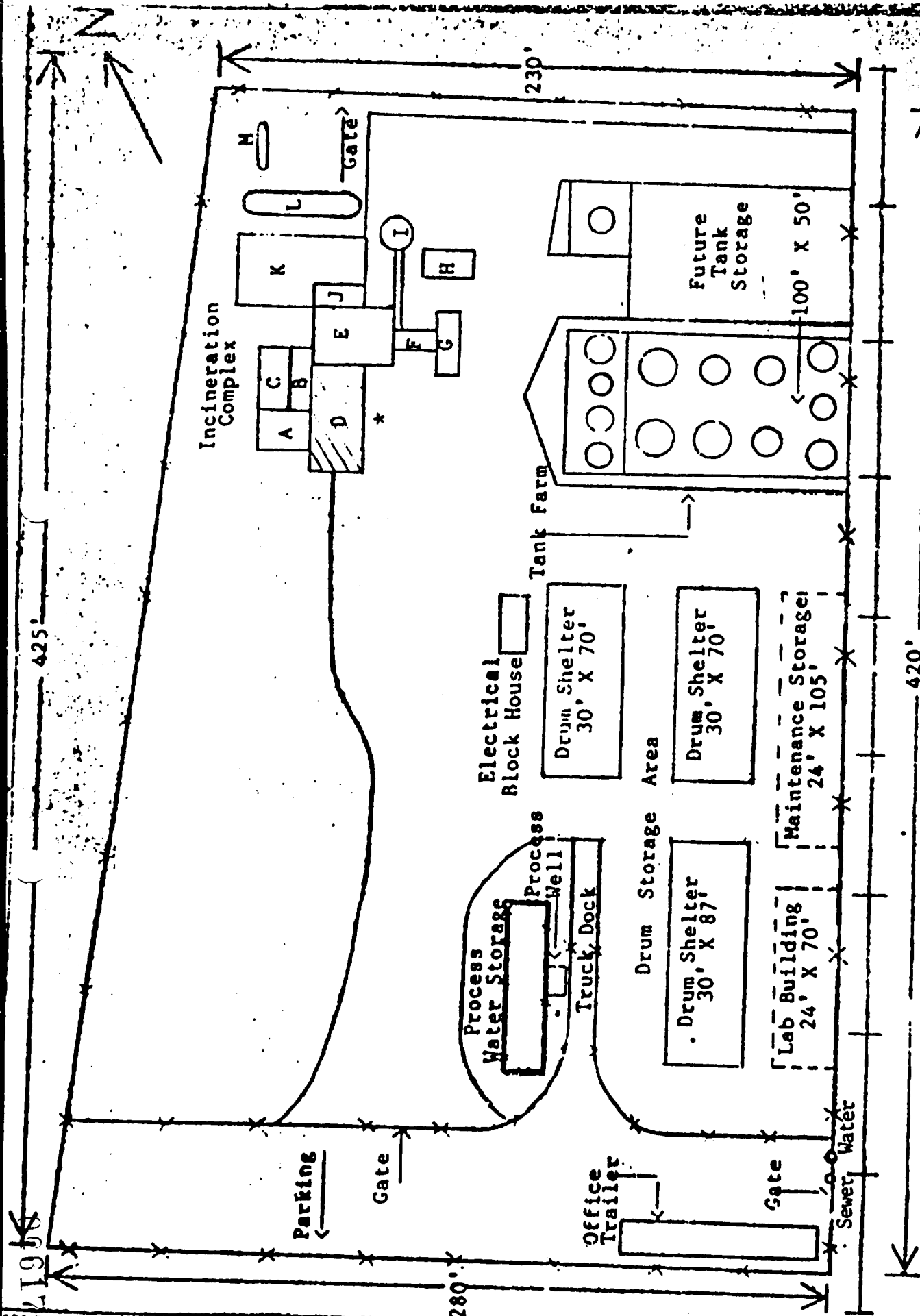
006171

ATTACHMENT A

A parcel of land situated in and being a portion of Lots 201, 204, 205, 208, 209, 212, 213, 216, 217, 220, 221, 224, 225, 228, 229, 232 and 233 of the Third Subdivision of Cahokia Commons, U.S. Survey No. 759 in St. Clair County, Illinois, said parcel of land being more particularly described as follows: Begin at the point where the Southeast line of a 50 foot wide strip of Railroad right-of-way as acquired by the former St. Louis and Cairo Railroad Company from E. C. Kehr by deed dated October 26, 1882 and recorded in Deed Book 179 on page 472, intersects a line that lies parallel with and 50 feet normally distant northeasterly from the southeasterly extension of the centerline of Sidney Street as laid out in the City of St. Louis, Missouri, said intersection being the westerlymost corner of a 26.34 acre tract of land acquired by the former Mobile and Ohio Railroad Company from J. Pitzman, et al, by deed dated June 11, 1898 and recorded in Deed Book 252 on page 459, and run northeasterly along the aforesaid Southeast line of said 50 foot wide strip of Railroad right-of-way, and along the Southeast line of a 50 foot wide strip of Railroad right-of-way as acquired by said former St. Louis and Cairo Railroad Company from R. E. Rombauer, et ux, by deed dated October 26, 1882 and recorded in Deed Book 179 on page 469, and from W. H. Snyder, et ux, by deed dated December 22, 1882 and recorded in Deed Book 168 on page 429, being in part along the Northwest line of the aforesaid 26.34 acre tract, and in part along the Northwest line of that property described in GRANT OF EASEMENT, F. Pitzman and J. E. Methudy, Trustees, in favor of the former Mobile and Ohio Railroad by document dated March 12, 1929 and recorded in Book 723 on page 395 (crossing a line that lies parallel with and 100 feet normally distant southerly from the westerly extension of the North line of said Lot 232 at approximately 4568 feet), a total distance of approximately 4829 feet to the northerlymost corner of the aforesaid "Pitzman-Methudy, Trustees" tract; thence S73°30'E, 41.46 feet; thence S31°33'45"W, 163.63 feet; thence S21°51'30"W, 879.08 feet to a property corner; thence 68°08'30"W, 40.00 feet to a property corner; thence southwesterly along the northwest line of that property conveyed by Grantor to the Village of Sauget by deed dated February 2, 1981, to the Village of Sauget by deed dated December 20, 1979, and to the Clayton Chemical Company by deed dated August 28, 1980, being in part along a line that lies parallel with and 10 feet normally distant southeasterly from the centerline of Grantor's Track #10-A, a total distance of approximately 1591 feet to the Southeast line of the aforesaid former 26.34 acre "Pitzman, et al," tract; thence S21°51'30"W along the Southeast line of said 26.34 acre tract, approximately 2077 feet to the aforesaid line that lies parallel with and 50 feet normally distant northeasterly from the southeasterly extension of the centerline of Sidney Street; thence N63°06'30"W along said parallel line, 301.16 feet to return to the point of beginning.

RLM/tk/b

006172

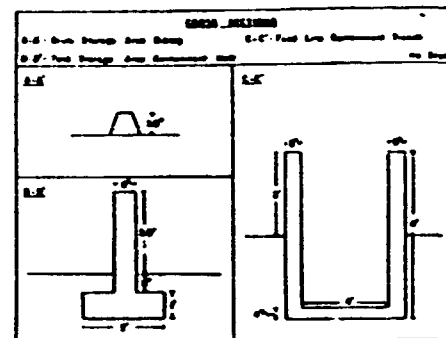


- | | | |
|------------------------|--------------------|-----------------------------|
| A Maintenance shop | E Process building | I Stack |
| B Motor control center | F Incinerator | J Instrument room |
| C Air/hydraulic | G Ash dumpster | K Production office/lockers |
| D Loading dock | H Scrubber tank | L Liquid ammonia |
| * Shredder (mobile) | | M Propane |

00061
JAN 12 1964
EPA - D.L.P.C.
STATE OF ILLINOIS
6 2 0 6

JAN 12 1964

7.E.P.A. - D.L.P.C.
STATE OF ILLINOIS



Trade Waste Incineration, Inc.
Sauget, Illinois
Site Plan

TRADE WASTE INCINERATION
A DIVISION OF
CHEMICAL WASTE MANAGEMENT, INC.

INCORPORATION PROCESS

MODULE A

Drawing Number : 9-0000
 Page Number : 10 of 10
 Drawn By : [Signature]

2025 - 2026
 2027 - 2028 - 2029 - 2030